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Request for Information for Paul Wellstone and Pete Domenici Mental Health Parity and Addiction

Equity Act of 2008

Comment On: IRS-2009-0008-0120

Interim Final Rules Under the Paul Wellstone and Pete Domenici Mental Health Parity and

Addiction Equity Act of 2008

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General Comment

It is my understanding that even though Psychiatrists, Psychologists and Counselors would be considered specialists by plan definition just as other non-primary care are that you cannot charge a specialist copay like you can for medical services. However could you charge say a primary care copay for a group session and specialist copay for individual session? Or could you say counselors would be a primary care copay and psychiatrists and psychologists would be the specialist copay?